

JAP:KLK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

15-j73 M

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21, U.S.C., § 963)

HEERALALL SUKDEO,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RYAN VARRONE, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between June 10, 2015 and June 23, 2015, within the Eastern District of New York and elsewhere, the defendant HEERALALL SUKDEO, together with others, did knowingly and intentionally conspire to import from outside the United States a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 963.

(Title 21, United States Code, Section 963)

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about June 10, 2015, a white metal shipping container with the words "Seaboard Marine" printed in blue lettering on the side and bearing container number

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

SMLU5463350 arrived at the Red Hook Terminal in Brooklyn, New York. The shipment originated from an address in Guyana and was addressed to "Randolph Fraser" at an address, in Queens, New York. The container was selected for further inspection by Customs and Border Protection ("CBP") and HSI was notified.

2. On or about June 15, 2015, the container was inspected with the assistance of a drug-detection canine. The canine alerted to the presence of narcotics. Law enforcement agents conducted a more extensive inspection of the container and found multiple containers of frozen shrimp and other frozen seafood products inside. Further inspection revealed approximately 268 kilograms of cocaine concealed in wrapped packages hidden inside the parcels of frozen shrimp.

3. Individual containers of seafood within the shipping container are individually marked with labels identifying the shipper's name, address and telephone number in Guyana. A review of law enforcement records indicates that the shipper's telephone number identified on the individual package labels belongs to the defendant HEERALALL SUKDEO.

4. On or about June 15, 2015, the shipment recipient was notified that the shipment had cleared customs and was available to be retrieved at the Red Hook site in Brooklyn, New York. Before releasing the shipment, HSI agents removed the narcotics from the container and replaced all other non-narcotic items to maintain the appearance of the shipment. On or about June 22, 2015, an individual arrived at the Red Hook Terminal and retrieved the shipment (the "Target Shipment"). HSI agents observed the Target Shipment being driven to various locations around New York City and stored overnight before it was

eventually delivered to a storage facility in Brooklyn, New York (the “Brooklyn Warehouse”) in the morning of June 23, 2015.

5. The defendant HEERALALL SUKDEO, together with others, arrived at the Brooklyn Warehouse in the morning of June 23, 2015. HSI agents observed HEERALALL SUKDEO organizing and supervising the unloading of the Target Shipment from the truck.

6. When approached by law enforcement agents, the defendant HEERALALL SUKDEO initially denied that he had any connection to the Target Shipment and stated, in sum and substance, that he was not at the Brooklyn Warehouse to unload the Target Shipment. SUKDEO further stated, in sum and substance, that he was present at the Brooklyn Warehouse in order to retrieve a different, unrelated shipment of goods and was only in the vicinity of the truck containing the Target Shipment because he was curious about its contents. HEERALALL SUKDEO further denied, in sum and substance, that he was Randolph Fraser and that he was connected with the Target Shipment in any way.

7. HSI agents subsequently interviewed additional witnesses at the scene, including a Brooklyn Warehouse employee (the “Employee”). The Employee informed HSI agents that he knows the defendant HEERALALL SUKDEO as Randolph Fraser. The Employee further informed HSI agents that SUKDEO rented storage space in the Brooklyn Warehouse under the name Randolph Fraser.


WHEREFORE, your deponent respectfully requests that defendant  
HEERALALL SUKDEO be dealt with according to law.

Dated: Brooklyn, New York  
June 24, 2015



RYAN VARRONE  
Special Agent  
Homeland Security Investigations

Sworn to before me on  
the 24<sup>th</sup> day of June, 2015



THE HONORABLE BLOOM  
UNITED STATES M. RATE JUDGE  
EASTERN DISTRICT NEW YORK